

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,**

Plaintiff,

v.

**SEYED TAHER KAMELI, CHICAGOLAND
FOREIGN INVESTMENT GROUP, LLC, and
AMERICAN ENTERPRISE PIONEERS, INC.**

Defendants,

and

**BRIGHT OAKS PLATINUM PORTFOLIO,
LLC, PLATINUM REAL ESTATE AND
PROPERTY INVESTMENTS, INC., and
BRIGHT OAKS DEVELOPMENT, INC.,**

Relief Defendants.

Civil Action No. 1:17-cv-4686

Hon. Franklin U. Valderrama

Mag. Judge Hon. Maria Valdez

**PLAINTIFF’S AGREED MOTION FOR ENTRY OF JUDGMENT BY CONSENT
AGAINST DEFENDANTS SEYED TAHER KAMELI, CHICAGOLAND FOREIGN
INVESTMENT GROUP, LLC, AND AMERICAN ENTERPRISE PIONEERS, INC., AND
RELIEF DEFENDANTS BRIGHT OAKS PLATINUM PORTFOLIO, LLC, PLATINUM
REAL ESTATE AND PROPERTY INVESTMENTS, INC., AND BRIGHT OAKS
DEVELOPMENT, INC.**

Plaintiff, U.S. Securities and Exchange Commission (the “SEC”), respectfully moves this Court for entry of Judgment by consent against Defendants Seyed Taher Kameli, Chicagoland Foreign Investment Group, LLC, and American Enterprise Pioneers, Inc. (collectively, “Defendants”), and Relief Defendants Bright Oaks Platinum Portfolio, LLC, Platinum Real Estate and Property Investments, Inc., and Bright Oaks Development, Inc. (collectively, “Relief Defendants”). The SEC has filed a Second Amended Complaint against Defendants and Relief Defendants. (*See* Docket Entry No. 192). Defendants and Relief Defendants have agreed to resolve this matter by the entry of a Judgment. (*See* Exhibit A, Consent of Defendants and Relief Defendants). Accordingly, the SEC now submits proposed a Judgment against Defendants and Relief Defendants. (*See* Exhibit B, proposed Judgment). The SEC has submitted this proposed Judgment to the Court’s e-mail address at Proposed_Order@ilnd.uscourts.gov. Defendants and Relief Defendants agree to the motion.

WHEREFORE, the SEC respectfully requests that this Court: (i) grant this agreed motion; (ii) enter a Judgment by consent against Defendants and Relief Defendants; and (iii) award such other and further relief as this Court deems just.

Dated: December 24, 2021

Respectfully submitted,

/s/**Eric M. Phillips**

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Exchange Commission*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on December 24, 2021, he caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the Court's CM/ECF system, which shall send notification of such filing to the following counsel of record:

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Counsel for Defendants and/or Relief Defendants

/s/ Eric M. Phillips
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